

ORIGINAL

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Chloe, S.A.S., J. Choo Plaintiff,  
Limited

7 cv 6491 (WP)

- against -

Ken Chen a/k/a Shu Chen Defendant.  
a/k/a Xiang Chen, et al.

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Scott Gelin a member in good standing of  
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Katherine Compton  
Firm Name: Greenberg Traurig, LLP  
Address: 2200 Ross Avenue, Suite 5200  
City/State/Zip: Dallas, TX 75201  
Phone Number: (214) 665-3600  
Fax Number:

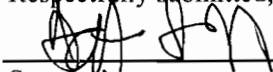
Katherine Compton is a member in good standing of the Bar of the States of  
**Texas**

There are no pending disciplinary proceeding against Katherine Compton  
in any State or Federal court.

Dated: 7/27/07

City, State: New York, New York

Respectfully submitted,



Sponsor's  
SDNY Bar **SG-9599**  
Firm Name: **Greenberg Traurig, LLP**  
Address: **200 Park Avenue**  
City/State/Zip: **New York, N.Y. 10166**  
Phone Number: **(212) 801-2191**  
Fax Number: **(212) 801-9200**

Scott Gelin (SG 9599)  
GREENBERG TRAURIG, LLP  
Met Life Building  
200 Park Avenue  
New York, New York 10166  
(212) 801-9200

*Attorney for Plaintiff*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Chloe, S.A.S., J.Choo Limited,

Plaintiff,

v.

Ken Chen a/k/a Shu Chen Defendant,  
a/k/a Xiang Chen, et al.

Defendant

07 Cv. 6491 (WP)

**AFFIDAVIT OF SCOTT GELIN IN  
SUPPORT OF THE MOTION FOR  
PRO HAC VICE ADMISSION OF  
KATHERINE COMPTON**

STATE OF NEW YORK            )  
  ) ss:  
COUNTY OF NEW YORK        )

SCOTT GELIN, being duly sworn, deposes and says:

1. I am an attorney admitted to practice in the Southern District of New York and I am employed by the firm Greenberg Traurig, LLP, ("Greenberg"), attorneys for Plaintiffs in the above-captioned matter. I submit this affidavit in support of the motion for pro hac vice admission of my colleague Katherine Compton, attorney from Greenberg's Dallas office.

2. I have found Ms. Compton to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

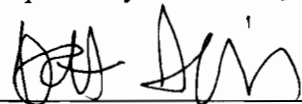
3. Ms. Compton is a member in good standing of the bar of the District of Texas. She is familiar with Plaintiffs' business, the facts and the circumstances in the above captioned matter, and the Plaintiffs would like her to represent them in this matter.

4. A copy of a Certificate of Good Standing issued to Ms. Compton on July 25, 2007 by the State Bar of Texas is annexed hereto as Exhibit A.


WHEREFORE, it is respectfully requested that the motion to admit Ms. Katherine Compton's, pro hac vice be granted.

Dated: New York, New York  
July 27, 2007

Respectfully Submitted,

  
\_\_\_\_\_  
Scott Gelin

Sworn to before me this  
27th day of July, 2007

  
\_\_\_\_\_  
NOTARY PUBLIC

JAMES H. DONOIAN  
Notary Public State New York  
No. 02DO6029195  
Qualified in New York County  
Commission Expires August 8, 2009

# STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

July 25, 2007


Re: Kathy Compton, State Bar Number 04652100

To Whom It May Concern:

This is to certify that Ms. Kathy Compton was licensed to practice law in Texas on November 8, 1985, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

No previous disciplinary sanctions have been entered against Ms. Compton's law license.

Sincerely,

  
John A. Neal  
Chief Disciplinary Counsel

JN/ss



**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

Chloe, S.A.S., J. Choo Limited Plaintiff,

7 cv 6491 (WP )

- against -

Ken Chen a/k/a Shu Chen a/k/a Defendant.  
Xiang Chen, et al.

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Scott Gelin attorney for Plaintiff

and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Katherine Compton  
Firm Name: Greenberg Traurig, LLP  
Address: 2200 Ross Avenue, Suite 5200  
City/State/Zip: Dallas, TX 75201  
Telephone/Fax: (214) 665-3600  
Email Address: [comptonk@gtlaw.com](mailto:comptonk@gtlaw.com)

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State: New York, New York

\_\_\_\_\_  
United States District/Magistrate Judge

Harley I. Lewin, Esq.  
 Scott Gelin, Esq.  
 Greenberg Traurig LLP  
 200 Park Avenue, 34<sup>th</sup> Floor  
 New York, New York 10166  
 (212) 801-9200  
*Attorneys for Plaintiffs*

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 CHLOÉ, S.A.S., J. CHOO LIMITED,  
 Plaintiffs,  
 - against -  
 KEN CHEN a/k/a SHU CHEN a/k/a XIANG  
 CHEN, DANIEL DOE, GODDESS TRADING  
 d/b/a GODDESSTRADING@HOTMAIL.COM,  
 LUXUNG GOODS, LUXURY GOODS, TERRY  
 DOE d/b/a AZNTERRY911@HOTMAIL.COM,  
 JASON DOE d/b/a  
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 HANDBAGS, BENNY DOE, JEANCARLO  
 DOE, JOSEPH a/k/a JOSE DOE, SISI a/k/a CECI  
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 INSTYLE LUXURY HANDBAGS, CORINA  
 DOE a/k/a QIMIAO HU a/k/a QI MIAO HU,  
 KENNY DOE a/k/a YE GUO a/k/a GUO Q YE,  
 NEWCOME TRADING d/b/a TOSCA, QUICK  
 GLOBAL SHIPPING, HOWARD EXPRESS  
 SHIPPING, RANDY DOE, and various JOHN  
 and JANE DOES 1-10 and XYZ COMPANIES  
 (UNIDENTIFIED),  
 Defendants.  
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:  
 Civil Action No.: 07 CV 6491 (WCP)  
 :  
 [FILED UNDER SEAL  
 : PURSUANT TO 15 U.S.C. § 1116]

### **PROOF OF SERVICE**

I, Michell A. Reid declare:

- 1) I am a resident of the State of New York and over the age of eighteen years, and not party to the within action; my business address is 200 Park Avenue, New York, NY 10166. On July 30, 2007, I served the following document


Pro Hac Vice Motion of Katherine Compton, Esq.

by personally placing a true copy in a sealed envelope with postage fully paid I the in the United States mail to the person at the addresses listed below:

**SEE ATTACHED RIDER**

I declare under penalty of perjury laws under the laws of the State of New York that the above is true & correct.

Executed on July 30, 2007 at New York, New York

  
\_\_\_\_\_  
Michelle A. Reid



**RIDER A**

Tae Hyung Whang, Esq.  
Pak & Whang PC  
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*Attorney for Chen Xing Gift Chop & Enyi Huang*